According to the Federal Circuit Court, the use of the word "about" avoids a strict numerical boundary to a specified parameter, and its range must be interpreted in its technologic and stylistic context. *Pall Corp. v. Micron Seps.*, 66 F.3d 1211, 1217, 36 USPQ2d 1225, 1229. In the claims of the present application, the term "about" is used to avoid a strict numerical boundary for a voltage. For example, claim 4 recites "about 2.5 volts peak-to-peak." Applicants submit that a person skilled in the field of electrical engineering would recognize that a real-world voltage can probably never be quantified as being any particular exact value, and that therefore, the use of the term "about" is fully appropriate, and not indefinite, in the context of the claims. Accordingly, Applicants respectfully request that the Office withdraw the objections to the claims.

In section 5 of the Office Action, claims 1, 2, 6, 10 and 25 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,631,063 to Ortiz et al. (hereinafter "the Ortiz et al. patent"). Applicants respectfully traverse this rejection.

Claim 1 provides a method of testing an electrical switchgear system. The method includes, *inter alia*, applying an analog signal to a node in the electrical switchgear system, wherein the analog signal simulates a power line signal.

The Ortiz et al. patent with reference to FIG. 8, discloses a controller 80 that includes analog inputs 81 (col. 6, lines 51 – 52), also referred to as input ports 81 (col. 6, line 53). FIG. 8 also includes reference numerals 8, which appear to designate signals to input ports 81, but the Ortiz et al. patent does not otherwise describe reference numerals 8. However, the Ortiz et al. patent states that input ports 81 receive street lighting circuit voltages $V_{1\text{-}n}$ (col. 6, lines 53 – 54). With reference to FIG. 2, the Ortiz et al. patent explains that a monitor 10 continuously senses the level of voltage of the street light circuits via measuring transducers $22_{1\text{-}n}$, which continuously detect and quantify the voltage levels $V_{1\text{-}n}$ in each circuit (col. 4, lines 32 – 37). Thus, voltage levels $V_{1\text{-}n}$ are representations of the actual voltages in the street light circuits.

The Office Action suggests that the Ortiz et al. patent, FIG. 8, reference numeral 8, is a disclosure of the analog signal of claim 1. Since the Ortiz et al. patent does not describe reference numeral 8, Applicants are assuming that the Office Action intended to indicate that the

voltage levels V_{1-n} are a disclosure of the analog signal of claim 1. Nevertheless, whereas the voltage levels V_{1-n} of the Ortiz et al. patent are representations of the **actual voltages** in the street light circuits, they do not **simulate a power line signal**, as recited by claim 1. Accordingly, the Ortiz et al. patent does not anticipate claim 1.

Claims 2, 6 and 10 depend from claim 1. At least because of this dependence, claims 2, 6 and 10 are also novel over the Ortiz et al. patent.

Claim 25 is an independent claim that includes a recital similar to that of claim 1, as described above. Therefore, at least because of reasoning similar to that provided in support of claim 1, the Ortiz et al. patent does not anticipate claim 25.

Applicants respectfully request reconsideration and withdrawal of the section 102(e) rejection of claims 1, 2, 6, 10 and 25.

In section 7 of the Office Action, claims 3 – 5, 7 – 9, 11 – 24 and 26 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Ortiz et al. patent in view of U.S. Patent No. 5,737,168 to Baker (hereinafter "the Baker patent"). Applicants respectfully traverse this rejection.

Claims 3 – 5, 7 – 9 and 11 depend from claim 1. Accordingly, below, Applicants are addressing the patentablity of claim 1 over the cited combination of the Ortiz et al. and Baker patents.

Above, in support of claim 1, Applicants explained that the Ortiz et al. patent does not disclose that an analog signal simulates a power line signal, as recited in claim 1. However, the Office Action, on page 5, for example, suggests that the Baker patent discloses an analog signal at col. 11, lines 58 – 59. The Baker patent, at col. 11, lines 58 – 59, describes a test voltage 66. Referring to FIG. 3, the Baker patent explains that (a) a line one signal 50 outputted by a bridge rectifier 204 is a DC voltage whose level corresponds to an AC line-to-neutral voltage of an AC power source, and (b) line one signal 50 is converted into test voltage 66 by sealing circuit 332

(col. 11, lines 45 – 49). Therefore, test voltage 66 is also a DC voltage whose level corresponds the AC line-to-neutral voltage of the AC power source.

Whereas test voltage 66 is a **DC voltage** whose level corresponds the **AC line-to-neutral voltage** of the AC power source, test voltage 66 is neither (i) an **analog voltage**, nor (ii) a **simulated power line signal**. Therefore, the cited combination of the Ortiz et al. and Baker patents neither discloses nor suggests that an analog signal simulates a power line signal, as recited in claim 1. Thus, claim 1 is patentable over the cited combination of the Ortiz et al. and Baker patents.

As mentioned above, claims 3 – 5, 7 – 9 and 11 depend from claim 1. At least because of this dependence, claims 3 – 5, 7 – 9 and 11 are also patentable over the cited combination of the Ortiz et al. and Baker patents.

Applicants note that the Office Action recognizes that the Ortiz et al. patent does not disclose the features of claims 3 – 5, but the Office Action suggests that test voltage 66 of the Baker patent is descriptive of an analog signal as recited in each of claims 3 - 5. However, whereas test voltage 66 is a **DC voltage** whose level corresponds to the AC line-to-neutral voltage, the Baker patent does not disclose or suggest the **analog signal** of any of claim 3 – 5. Therefore, claims 3 – 5, in addition to being patentable because of their dependence on claim 1, are also patentable on their own merits.

Additionally, claims 7 and 8 recites features where the analog signal simulates a particular condition of the power line signal. The Office Action recognizes that the Ortiz et al. patent does not disclose the features of claims. However, whereas test voltage 66 of the Baker patent **is not a simulated power line signal**, the Baker patent does not disclose or suggest that an analog signal **simulates** a condition of the power line signal, as recited in claims 7 and 8. Therefore, claims 7 and 8, in addition to being patentable because of their dependence on claim 1, are also patentable on their own merits.

Claims 12 and 13 are independent claims. Each of claims 12 and 13 include a recital similar to that of claim 1, as described above. Therefore, claims 12 and 13, similarly to claim 1, are patentable over the cited combination of the Ortiz et al. and Baker patents.

Claims 14 – 23 depend from claim 13. At least because of this dependence, claims 14 – 23 are patentable over the cited combination of the Ortiz et al. and Baker patents. Additionally, claims 15 – 17, similarly to claims 3 – 5, further refine an analog signal, and claims 19 and 20, similarly to claims 7 and 8, recite a feature of the analog signal simulating a condition of a power line signal. As explained above in support of claims 3 – 5, 7 and 8, these features are neither disclosed nor suggested by the Baker patent. Accordingly, Applicants submit that the recitals of claims 15 – 17, 19 and 20 are patentable over the cited combination of the Ortiz et al. and Baker patents.

Claims 24 and 26 are independent claims. Each of claims 24 and 26 include a recital similar to that of claim 1, as described above. Therefore, claims 24 and 26, similarly to claim 1, are patentable over the cited combination of the Ortiz et al. and Baker patents.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 3 – 5, 7 – 9, 11 – 24 and 26.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Respectfully submitted,

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